

October 11, 2022

National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2310A)
Washington, DC 20460

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (ORC-1)
San Francisco, CA 94105

Via FOIA Online

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, I am requesting the following documents:

1. All civil enforcement case reports related to the Elly, Ellen, and/or Eureka platforms and/or the San Pedro Bay Pipeline in the Beta oil field located in the Pacific Ocean from 1975 to 2007, including those involving: SHELL OIL CO., SHELL CALIFORNIA PRODUCTION, INC., SHELL WESTERN E&P INC., CALRESOURCES LLC, AERA ENERGY LLC, PACIFIC ENERGY RESOURCES LTD., RISE ENERGY BETA LLC, SP BETA PROPERTIES LLC, and MEMORIAL PRODUCTION PARTNERS LP.
2. All civil enforcement case reports related to the Elly, Ellen, and/or Eureka platforms and/or the San Pedro Bay Pipeline in the Beta oil field located in the Pacific Ocean from 2007 to the present, including those involving: AMPLIFY ENERGY CO., BETA OFFSHORE, and SAN PEDRO BAY PIPELINE CO.
3. All reported violations related to the Elly, Ellen, and/or Eureka platforms and/or the San Pedro Bay Pipeline in the Beta oil field located in the Pacific Ocean from 1975 to 2007, including those involving: SHELL OIL CO., SHELL CALIFORNIA PRODUCTION, INC., SHELL WESTERN E&P INC., CALRESOURCES LLC, AERA ENERGY LLC, PACIFIC ENERGY RESOURCES LTD., RISE ENERGY BETA LLC, SP BETA PROPERTIES LLC, and MEMORIAL PRODUCTION PARTNERS LP.
4. All reported violations related to the Elly, Ellen, and/or Eureka platforms and/or the San Pedro Bay Pipeline in the Beta oil field located in the Pacific Ocean from 2007 to the present, including those involving: AMPLIFY ENERGY CO., BETA OFFSHORE, and SAN PEDRO BAY PIPELINE CO.

5. All Final Orders related to the Elly, Ellen, and/or Eureka platforms and/or the San Pedro Bay Pipeline in the Beta oil field located in the Pacific Ocean from 1975 to 2007, including those involving: SHELL OIL CO., SHELL CALIFORNIA PRODUCTION, INC., SHELL WESTERN E&P INC., CALRESOURCES LLC, AERA ENERGY LLC, PACIFIC ENERGY RESOURCES LTD., RISE ENERGY BETA LLC, SP BETA PROPERTIES LLC, and MEMORIAL PRODUCTION PARTNERS LP.
6. All Final Orders related to the Elly, Ellen, and/or Eureka platforms and/or the San Pedro Bay Pipeline in the Beta oil field located in the Pacific Ocean from 2007 to the present, including those involving: AMPLIFY ENERGY CO., BETA OFFSHORE, and SAN PEDRO BAY PIPELINE CO.
7. All documents related to inspections of the Elly, Ellen, and/or Eureka platforms and/or the San Pedro Bay Pipeline in the Beta oil field located in the Pacific Ocean dating from 2012 to present, including but not limited to reports, underlying data informing such reports, records exchanged in connection with inspections, follow-up correspondence with the relevant platform pipeline owners and/or operators, and documentation of required remedial action.

Please provide responsive information as it become available on a rolling basis but consistent with the prescribed timelines of the Freedom of Information Act. Please provide the requested records in electronic or paper form, whichever is faster. If this request must be forwarded to a different records custodian, we request that it be so forwarded as soon as possible.

Should you decide to invoke a FOIA exemption or withhold or redact any responsive records or parts thereof, we request that you: (1) identify each such record with specificity and/or date, author, recipient, and parties copied; (2) explain in full the basis for withholding responsive material; and (3) provide all segregable portions of the records for which you are claiming a specific exemption. Please correlate any redactions with specific exemptions under FOIA.

If you determine that portions of certain documents are exempt from production, the remainder of said documents should be produced nonetheless along with explanations justifying each exemption, including the specific FOIA provision justifying the exemption. 5 U.S.C. 552(b).

History Associates agrees to pay all reasonable and standard processing fees that will be assessed in association with this request, up to the amount of \$1,000.00. Should the fees exceed this amount, please call me with an estimate of the total costs in order that specific expenditures beyond \$1,000.00 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email to asmith@historyassociates.com.

Thank you for your attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Annabelle Smith', with a stylized flourish at the end.

Annabelle Smith
Research Historian